

JACQUELINE M. JAMES, ESQ.

THE JAMES LAW FIRM  
445 HAMILTON AVENUE  
SUITE 1102  
WHITE PLAINS, NY 10601

T: (914) 358 6423  
F: (914) 358 6424  
[JJAMES@JACQUELINEJAMESLAW.COM](mailto:JJAMES@JACQUELINEJAMESLAW.COM)  
JACQUELINEJAMESLAW.COM

July 16, 2025

The Honorable Loretta A. Preska  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

***Re: 1:25-cv-03191-LAP; Plaintiff's Request for an Extension of Time Within Which to Effectuate Service on Defendant***

Dear Judge Preska,

The James Law Firm, PLLC represents Plaintiff in the above captioned matter. This matter has been filed as a John Doe against the internet subscriber assigned the referenced IP address. Plaintiff respectfully requests an extension of the time within which to effectuate service on John Doe.

On April 17, 2025, Plaintiff filed the instant case against John Doe subscriber assigned IP address 184.152.216.21 claiming Defendant's direct infringement of Plaintiff's works through BitTorrent protocol.

On June 24, 2025, the Court granted Plaintiff leave to serve a third-party subpoena. Plaintiff served Defendant's ISP with a third-party subpoena on or about July 8, 2025, and in accordance with the time allowances provided to both the ISP and Defendant, expects to receive the ISP response on or about August 14, 2025.

Pursuant to Fed. R. Civ. P. Rule 4(m), Plaintiff is required to effectuate service on the Defendant no later than July 16, 2025.

Because Plaintiff does not expect to receive the ISP response until August 14, 2025, and Defendant's identity is unknown to Plaintiff at this time, Plaintiff is unable to comply with the current deadline to effect service of process.

Plaintiff respectfully requests that the deadline to effect service be extended for sixty (60) days from August 14, 2025 (the date Plaintiff expects to receive the ISP response), and thus the deadline to effect service be extended to October 13, 2025. This extension should allow Plaintiff time to receive the ISP response, to conduct a further investigation to assist in determining

whether the individual identified by the ISP is the appropriate defendant for this action, and, if a good faith basis continues to exist, to proceed against that individual (or someone else), amend the Complaint to name the Defendant and attempt to effect service of process on that individual.

For the foregoing reasons, Plaintiff respectfully requests that the time within which it has to effectuate service of the summons and Amended Complaint on Defendant be extended to October 13, 2025.

Respectfully Submitted,

Plaintiff's request for an extension to effectuate service of the summons and Amended Complaint until October 13, 2025 in the above-captioned case and the other cases listed below is GRANTED. The Clerk of the Court shall close the open docket numbers that correspond with Plaintiff's letter request.

By: /s/Jacqueline M. James  
Jacqueline M. James, Esq. (1845)  
The James Law Firm, PLLC  
445 Hamilton Avenue, Suite 1102  
White Plains, New York 10601  
T: 914-358-6423  
F: 914-358-6424  
[jjames@jacquelinejameslaw.com](mailto:jjames@jacquelinejameslaw.com)

- 25-CV-3226
- 25-CV-3224
- 25-CV-3204
- 25-CV-3202
- 25-CV-3200

**SO ORDERED.**

Dated: July 21, 2025

  
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LORETTA A. PRESKA, U.S.D.J.